

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Jeremy Paul Batts and Susan Beth Batts as)
Co-Personal Representatives of the Estate)
of Kaiea Spring Batts, Deceased)

CASE NUMBER: 2:23-cv-03565-DCN

Plaintiff,)

vs.)

SNAP INC. d/b/a/ SNAPCHAT, INC.,)
Evan Spiegel and Emily White,)

PLAINTIFFS' MOTION TO CONDUCT
JURISDICTIONAL DISCOVERY

Defendants.)

Plaintiffs Jeremy Paul Batts and Susan Beth Batts, as Co-Personal Representatives of the Estate of Kaiea Spring Batts, by and through their undersigned counsel, hereby move, in the alternative to denying Defendants' Motion to Dismiss, for permission to conduct jurisdictional discovery. The grounds for the motion are set out in Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss and Plaintiffs' Memorandum in Support of Plaintiff's Motion for Jurisdictional Discovery, as well as all other pleadings and documents in the record.

[signature page to follow]

Respectfully Submitted,

By: /s/Gedney M. Howe, IV

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